

May 4, 2014

Lila Cox Potocki,
13053 Roepke Road
Gregory, Michigan

Clerk of the United States Bankruptcy Court
Eastern District of Michigan-Southern Division
226 West Second Street
Flint, Michigan 48052

FILED

2014 MAY -6 A 9 14

U.S. BANKRUPTCY
E.D. MICHIGAN-DETROIT

RE: Case Number 14-30368

I am writing in response to the Trustee's motion;

NOTICE OF REQUIREMENT OF WRITTEN RESPONSE TO TRUSTEE'S MOTION TO SELL ALL
INVENTORY AT THE LOCATION OF THE DEBTOR INCLUDING BUT NOT LIMITED TO INVENTORY,
VEHICLES, COMPUTERS, AND VARIOUS OTHER ITEMS FREE AND CLEAR OF ALL LEANS AND
ENCUMBRANCES WITH ALL LIENS AND ENCUMBRANCES ATTACHING THE PROCEEDS OF SALE
PURSUANT TO 11 U.S.C. 363(F)

I am objecting to the motion because I have property at the facility that I paid in full for and it is rightfully mine. My property should not be sold to alleviate this debtor's legal obligations.

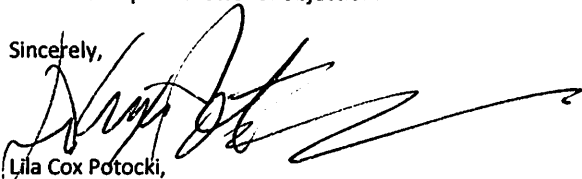
On October 1, 2013 I ordered and paid for in full (Sales Order/Credit Card Receipt attached) for a dining table and 8 chairs. In February, 2014 I received a call from the store informing me my table was in. I asked the store to hold the table for a couple of weeks as I was in the middle of a major home renovation. Before I could pick up my table, I received the first bankruptcy papers. On the day I received this paperwork, I went to the store. Trustee Sam Sweet was in the store and he allowed me to look for my table. I found my table which was clearly marked with my name on it, a copy of which is attached for your reference (Product Label attached).

Mr. Sweet made a notation on his notepad and allowed me to take my table out of the store. I left with a table top, 2 legs and 2 struts. Since I was still in the middle of renovations, I did not un-wrap the table. When I finally set the table up I discovered that the 2 leaves made for the table were not in the storage compartment of the table. I had assumed they were shipped inside the table. I contacted the manufacturer of my table who assured me the leaves were shipped with the table to the Ann Arbor location. I then immediately called Mr. Sweet to see if we could set a time for me to come and get the leaves. I talked to his secretary who said he would return my call but he did not. As of today, I have tried several times through phone and email to contact Mr. Sweet but he so far has refused to return my calls.

As I stated above, I object to this motion allowing the trustee to sell merchandise paid for and clearly marked with customer's name. I believe that merchandise does not belong to the debtor and should not be sold to alleviate his obligation. In fact, every effort should be made to ensure that property clearly marked with a customer's name gets to that customer.

In closing, I would like to apologize for the lateness of this letter. I had the date of May 22, 2014 as the date I needed to file the proof of claim and assumed that was the date I needed to respond by for this motion. Again, I apologize and I am hoping you will still accept this letter of objection.

Sincerely,



Lila Cox Potocki,

Enclosures

Furniture Sale

Store Phone: _____

E-Mail Address: _____

ADVERTISING CODE
 1-30
 68
 517-881-5048
 HOME PHONE

TV ☐ Print ☐ Radio ☐ Direct Mail ☐ Sign Walker ☐ Yard Signs ☐ Walk In / Drive By ☐
 Other ☐ Internet of Website ☐ Face Book / Craig's List ☐ Referral ☐ Be Back ☐

LAST NAME: Potock
 STREET ADDRESS: 13053 KORE RD
 CITY: GRACIA STATE: MI ZIP CODE: 48137
 DELIVERY INSTRUCTIONS: _____

FIRST NAME: LEH
 PICKUP / DELIVERY DATE: _____
 DAY: _____ DATE: 10-1-13

RESO # _____
 NOT VALID UNLESS STAMPED
 1026
 TAKE WITH ☐ PICK UP ☐ DELIVERY ☐ OTHER ☐
 SALES ORDER NO. _____

QTY.	LOCATION	SKU NUMBER	VENDOR	STOCK NUMBER	DESCRIPTION	FINISH/SIZE	CODE	AMOUNT
1	50		TW		Biltmore Table Solid Maple T/W			
2					BL-4266212- New Carrington FC-W 3173			
3								
4	50		WMP		Galveston Side Chair Maple 2100			
5					New Carrington			
6								
7								
8								
9								
10								
11								
12								
13								
14								

FINAL SALE "AS IS"
 NOT Subject to Cancellation
 NO Refunds or Exchanges
 X

SPECIAL INSTRUCTIONS: _____

CASHIER	TOTAL SALE	3200.00
DEPOSIT PAID BY	DELIVERY	
CASH	BUYER'S PREM.	
CHECK	SUBTOTAL	
CREDIT CD	SALES TAX	192.00
BALANCE TO BE PAID BY	TOTAL	3392.00
TBF	DEPOSIT	
L/away	BALANCE DUE	
CBD	BALANCE TO BE FINANCED	
OTHER		

to purchase the above merchandise under the terms of sale listed above.

Customer Copy

THANK YOU
 PLEASE COME AGAIN
 ALL SALES FINAL

MSR CARD
 XXXXXXXXXXXXXXX7437
 Entry Method: Swiped
 Batch#: 000002
 09:44:58
 10/01/13
 nvr: 00000001 Appr Code: 07304J
 3,392.00

total: \$ 3,392.00

SALE
 Merch ID: 040100374
 Term ID: 1989
 3570 HANCOCK
 ANN ARBOR MI 48109
 734-975-9080



Ord# **SO-8677**
Tbl# **10743-1**
PO#: 1028

A handmade 42" x 66" Biltmore Table w/2 leaves
fashioned from Brown Maple.

FC-N3173 New Carrington, 30 Sheen

Made especially for Potock

Dealer: Make-it Furniture

Dealer Ph: 734-975-9080

Mfg. date: 11-1-13

14-30368-dof Doc 48

Filed 05/06/14 Entered 05/06/14 09:16:59

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Item. BL4266-2L

Made in USA

MIF

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

FILED

2014 MAY -6 A 9 14

U.S. BANKRUPTCY
E.D. MICHIGAN-DETROIT

IN RE:

Case No 14-30368 dof

**RONALD H LAFLEUR,
d/b/a MAKE IT FURNITURE,
d/b/a NAKED FURNITURE OF
ANN ARBOR,**

**Chapter 7
Judge Daniel S Opperman**

Debtor.

CERTIFICATE OF SERVICE - MAIL

I, Scott D Kappler, hereby certify that on the date indicated below, I emailed to ssweet@trusteesweet.us AND mailed by United States Postal Service a copy of Creditor/Customer Lila Cox Potocki's Response to Trustee's Motion to Sell together with this Certificate of Service addressed to:

Samuel D Sweet, Esq
Attorney for trustee
PO Box 757
Ortonville, MI 48462

Dated: May 5, 2014



SCOTT D KAPPLER P41750
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Plymouth, MI 48170
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skapplerlaw@gmail.com